

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

ET Docket No. 92-9

RECEIVED

FEB 12 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF TELOCATOR

TELOCATOR, THE PERSONAL
COMMUNICATIONS INDUSTRY
ASSOCIATION

Thomas A. Stroup
Mark Golden
TELOCATOR
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036
(202) 467-4770

February 12, 1993

No. of Copies rec'd
List A B C D E

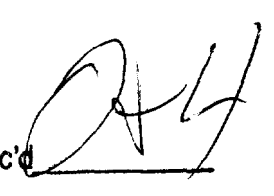


TABLE OF CONTENTS

	<u>Page</u>
SUMMARY.iii
I. TELOCATOR'S PROPOSALS IN ITS OPENING COMMENTS . . .	2
II. THE RECORD SUPPORTS TELOCATOR'S PROPOSAL FOR A TRANSITION PROCESS DESIGNED TO FAIRLY BALANCE THE COMPETING INTERESTS OF 2 GHZ INCUMBENT MICROWAVE LICENSEES AND EMERGING TECHNOLOGIES PROVIDERS WHILE ENSURING TIMELY AVAILABILITY OF EMERGING TECHNOLOGY SERVICES	3
A. The Record Reveals Widespread Support for Telocator's Assertions That the Relocation Process Should Begin as Soon as Possible Under Established Commission Procedures	3
1. The Commission's Rules Already Require Full Compensation and Provision of Comparable Alternative Facilities.	3
2. An Extended Transition Period Will Unreasonably Delay the Relocation Process and Create Opportunities for Windfalls.	6
B. Numerous Parties Agree With Telocator's Recommendation That the Commission Prescribe Procedures for Minimizing Disputes Over Compliance With Relocation Requirements	7
III. THE COMMENTS SUPPORT TELOCATOR'S ASSERTION THAT THE FCC SHOULD FACILITATE THE NEGOTIATION PROCESS BY ADOPTING GUIDELINES THAT DEFINE "COST COMPENSATION" AND "COMPARABILITY" OF ALTERNATIVE FACILITIES	8
A. The FCC Should Define "Cost Compensation" To Include Replacement Cost of Existing Facilities, Including All Expense Necessary To Bring the New System Into Operation, Where New Facilities Are Deemed To Be Comparable Alternatives	9

B.	An E.T. Provider's Showing That It Proposes Installing Facilities Whose Specifications Meet or Exceed Those of The Incumbent Licensee's Existing Facilities Should Give Rise To a Rebuttable Presumption of Comparability	9
1.	The Proposed Presumption Equitably Safeguards Interests of Incumbents in Reliable Replacement Facilities While Accommodating Those of E.T. Providers Who Wish To Deploy Their New Services Promptly	10
2.	Placing the Burden of Demonstrating Comparability on the E.T. Provider Is Inappropriate	10
IV.	THE COMMENTING PARTIES AGREE THAT SOME MECHANISM OF DISPUTE RESOLUTION IS ESSENTIAL IF THE TRANSITION PROCESS IS TO GO FORWARD	11
V.	THE COMMENTS RECOGNIZE THAT THE FCC MUST ADDRESS THE SPECIAL CONSIDERATIONS ASSOCIATED WITH RELOCATION OF 2 GHZ MICROWAVE LICENSEES FROM THE UNLICENSED BANDS .	13
A.	Most Commenting Parties (including both 2 GHz microwave licensees and E.T. proponents) Note That Total Band Clearing is Necessary Before Unlicensed Devices Can Be Broadly Introduced Into the Marketplace	13
B.	The Record Supports Telocator's Assertions That 2 GHz Microwave Licensees Who Cannot Technically Be Accommodated in Higher Bands, as Well as Exempt (true "public safety" Licensees Should Be Accorded a Preference in Access To Government Spectrum .	14
VI.	THE COMMENTS OVERWHELMINGLY FAVOR USE OF TAX CERTIFICATES AS A REGULATORY INCENTIVE TO FACILITATE NEGOTIATIONS	15
VII.	CONCLUSION	16

SUMMARY

In its opening comments, Telocator set forth proposals to create a fair and equitable process for the introduction of new Emerging Technologies services and the relocation of existing microwave licensees occupying 2 GHz spectrum. Those proposals included establishment of reasonable transition plans, guarantees of full cost compensation and comparable alternative facilities for relocated licensees, prescription of negotiation and dispute resolution processes, and consideration of the special issues affecting unlicensed devices, exempt microwave licensees, and tax certificates. The vast majority of commenting parties fully support Telocator's basic philosophy of facilitating the relocation process through these means.

In view of the record in this proceeding, the Commission should expeditiously adopt rules that will:

- promptly begin the relocation process and avoid unnecessary delays associated with extended transition periods;
- establish appropriate guidelines and objective standards to minimize disputes over relocation issues, particularly the definitions of cost compensation and comparable alternative facilities;
- prescribe an efficient mechanism for dispute resolution;
- accommodate the interests of unlicensed providers in total band clearing;

- make government spectrum in the 1710-1850 MHz band available on a priority basis for microwave licensees who cannot technically be relocated to higher bands or who are otherwise exempt from relocation; and
- utilize tax certificates to encourage the relocation process.

These points are discussed in greater detail below.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Redevelopment of Spectrum to)	ET Docket No. 92-9
Encourage Innovation in the)	
Use of New Telecommunications)	
Technologies)	

REPLY COMMENTS OF TELOCATOR

Telocator, the Personal Communications Industry Association, herewith replies to the comments filed with respect to the First Report and Order and Third Notice of Proposed Rulemaking ("First Report and Third Notice") in the above-captioned proceeding.¹ In its opening comments,² Telocator proposed a comprehensive transition process that strives to balance the needs of incumbent 2 GHz microwave licensees with those of Emerging Technologies ("E.T.") providers in order to promote the prompt and equitable deployment of new technologies. Below, Telocator highlights its consensus recommendations and responds to additional points and positions raised by commenting parties in the proceeding.

¹ FCC 92-437 (released October 16, 1992).

² Further Comments of Telocator, In the Matter of Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, ET Docket No. 92-9 (filed January 12, 1993). [hereinafter "Telocator"]

I. TELOCATOR'S PROPOSALS IN ITS OPENING COMMENTS

As an organization representing both prospective Emerging Technologies service providers and 2 GHz microwave licensees, Telocator has consistently sought to ensure an equitable and orderly transition process for the introduction of new technologies and the relocation of existing services. Thus, in earlier stages of the proceeding, Telocator proposed detailed consensus principles designed to foster these goals. Many of Telocator's principles have already been incorporated into the Commission's transition scheme.

In its opening comments, Telocator proposed further refinements in the Commission's rules to promote the prompt introduction of new technologies and reduce the potential for controversies associated with the relocation process. Specifically, Telocator offered detailed guidelines to govern negotiations between incumbent microwave licensees and new E.T. service providers and articulated a mechanism for dispute resolution. In addition, Telocator suggested significant modifications to the Commission's rules, including the need for special attention to treatment of unlicensed devices; establishment of priorities for access to the government spectrum at 1710-1850 MHz; and the use of tax certificates to facilitate the relocation process. As documented below, the record reveals much discussion of and support for Telocator's recommendations.

**II. THE RECORD SUPPORTS TELOCATOR'S PROPOSAL FOR A
TRANSITION PROCESS DESIGNED TO FAIRLY BALANCE THE
COMPETING INTERESTS OF 2 GHZ INCUMBENT MICROWAVE
LICENSEES AND EMERGING TECHNOLOGIES PROVIDERS WHILE
ENSURING TIMELY AVAILABILITY OF EMERGING TECHNOLOGY
SERVICES**

The comments reveal a consensus that the Commission's rules governing the transition process should equitably balance the competing interests of existing 2 GHz microwave licensees and Emerging Technologies providers in such a way as to promote the rapid availability of new services. By prescribing the details of the negotiation and relocation process, the Commission can avoid needless expense and delay while fulfilling its statutory mandate to promote the development of new technologies.

**A. The Record Reveals Widespread Support for
Telocator's Assertions That the Relocation Process
Should Begin as Soon as Possible Under Established
Commission Procedures**

**1. The Commission's Rules Already Require Full
Compensation and Provision of Comparable
Alternative Facilities**

The PCS industry has, from the earliest stages of this proceeding, expressed an unequivocal commitment to ensuring that relocations are accomplished without adverse effect upon incumbent licensees.³ Rather than an arbitrary and

³ In an earlier round of comments in this proceeding, Telocator proposed "a framework under which microwave
(continued...)

designated fixed period of time before incumbents faced any relocation obligations, Telocator argued (and the Commission, in the First Report and Order, adopted) a policy in which incumbents are protected for whatever amount of time is required to successfully accomplish any particular facility's relocation. In some cases, for example, situations in which unusual terrain, atmospheric conditions or land use restrictions must be contended with or in cases where an incumbent has many links and faces multiple, simultaneous relocation requests, the negotiated relocation process may take some time to complete. In other cases, however, relocations can and will be successfully accomplished very quickly. In either situation, the actual circumstances surrounding the particular subject licensee and facility and the amount of time required to actually accomplish the relocation should govern, rather than some arbitrary deadline. Such fixed time frame requirements serve only to

³(...continued)

licensees would have a right to continue 2 GHz operations until the "emerging technologies" licensee demonstrates that technically suitable facilities exist and the new entrant agrees to compensate the microwave licensee for its accommodations costs." Comments of Telocator, ET Docket No. 92-9 (filed June 8, 1992) at 6. See also Comments of American Personal Communications, ET Docket No. 92-9 (filed June 8, 1992) at 16-18 (noting that PCS can only be introduced effectively "if its inauguration protects the legitimate interests of incumbent users"); Comments of Personal Communications Network Services of New York, Inc. ET Docket No. 92-9 (filed June 8, 1992) at 5-8 (expressing support for a framework that "incorporates safeguards and procedures to minimize the impact on existing users").

either unnecessarily delay or unduly rush the technical transition, and are in no one's interest.

Many commenting parties agreed⁴ with Telocator as to the significance of the Commission's requirements⁵ that 2 GHz microwave licensees receive full compensation and comparable alternative facilities as a precondition to involuntary relocation. Indeed, as one party states, "[t]his focus on the particular needs of the incumbent to be relocated fully protects incumbent microwave users and meets completely Congressional concerns about preserving incumbents' reliability and protecting them from expending funds to relocate to other suitable bands."⁶ Therefore, once an Emerging Technologies provider complies with these conditions, "the substantial harm caused by delays in making spectrum available for emerging technologies cannot be justified by the putative countervailing benefit arising from a lengthy transition period."⁷

⁴ See, e.g., American Personal Communications ("APC") at 2-4; Cox Enterprises ("Cox") at 6; Omnipoint Communications, Inc. ("Omnipoint") at 1; Pacific Telesis at 1; Telocator at 7; Time Warner Telecommunications ("Time Warner") at 10-11.

⁵ See 47 C.F.R. § 21.50. In addition, the Emerging Technologies provider must move the incumbent back to its former home if the new facilities prove incapable, in actual operation, of providing comparable service.

⁶ APC at 2.

⁷ Time Warner at 11.

**2. An Extended Transition Period Will
Unreasonably Delay the Relocation Process and
Create Opportunities for Windfalls**

The record supports Telocator's belief that extended transition periods will only serve to obstruct the rapid and orderly deployment of new E.T. services. Proposals calling for extended transition periods of as much as fifteen years, in one instance,⁸ are unnecessary and unjustifiable given that the Commission's rules governing compensation and comparability are firmly in place. The only likely practical effect of such proposals will be "to encourage incumbents to seek windfall payments" in return for their early relocation.⁹ The burden of paying these windfall costs will ultimately be borne by PCS consumers.¹⁰ Clearly then, extended transition periods only serve to increase the time and expense involved in bringing new Emerging Technologies services to the public.

⁸ See Comments of Idaho Power Company ("Idaho Power") at 1.

⁹ APC at 3 n.7; Omnipoint at 1; Telocator at 7; Time Warner at 11-12 n.14.

¹⁰ APC at 3 n.7.

B. Numerous Parties Agree With Telocator's Recommendation That the Commission Prescribe Procedures for Minimizing Disputes Over Compliance With Relocation Requirements

The record supports Telocator's proposal to provide ET providers and 2 GHz licensees with maximum flexibility in satisfying relocation requirements and confirms that there is a need for orderly and established procedures to promote settlements. Telocator's proposal allows parties a choice of alternatives for relocation¹¹ and prescribes procedures to govern the process from the initiation of a request for relocation to implementation of new facilities. In so doing, Telocator specifically accommodates the concerns of microwave licensees that they be allowed to participate meaningfully in their relocation¹² as well as those of E.T. providers who are

¹¹ Specifically, Telocator proposed that parties could assent to one of three alternatives: (1) construction of "turn key" facilities; (2) reimbursement of reasonable expenses incurred; or (3) up front cost cash compensation depending on their particular needs. Telocator at 9.

¹² See, e.g., American Petroleum Institute ("API") at 16-18; American Public Power Association ("APPA") at 5-6; Association of American Railroads ("AAR") at 20-21; Central and South West ("CSW") at 12-14; Commonwealth Edison Company ("Commonwealth Edison") at 12-14; Lower Colorado River Authority ("LCRA") at 21-22; Metropolitan Water District of Southern California ("Metropolitan Water") at 12-14; Montana Power Company ("Montana Power") at 12-15; Niagara Mohawk Power Corporation ("Niagara Mohawk") at 12-14; Questar Service Corporation ("Questar") at 12-15.

anxious to commence the process without delay.¹³ Telocator's detailed transition procedures accommodate the diversity of concerns reflected in the record by giving parties maximum flexibility to structure their relocation agreements in a manner that is clearly consistent with the public interest.

III. THE COMMENTS SUPPORT TELOCATOR'S ASSERTION THAT THE FCC SHOULD FACILITATE THE NEGOTIATION PROCESS BY ADOPTING GUIDELINES THAT DEFINE "COST COMPENSATION" AND "COMPARABILITY" OF ALTERNATIVE FACILITIES

Many commenting parties agreed that the Commission should prescribe guidelines governing cost compensation and comparability in order to minimize potential disputes in the course of relocation negotiations. Telocator's proposals in this regard reflect a reasonable compromise between those parties who seek to limit expenditures¹⁴ and those who take more expansive views of compensation and comparability.¹⁵

¹³ Ameritech at 3; Cox at 5-7; Personal Communications Network Services of New York, Inc. ("PCNS-NY") at 13-15; Time Warner at 4-10.

¹⁴ Ameritech at 4; Cox at 7; PCNS-NY at 10-12; ROLM at 5.

¹⁵ API at 14-18; AAR at 19-21; CSW at 11-12; Commonwealth Edison at 11-12; Idaho Power at 1; LCRA at 21-22; Metropolitan Water at 12-14; Montana Power at 12-15; Niagara Mohawk at 11-14; Questar at 12-15.

A. The FCC Should Define "Cost Compensation" To Include Replacement Cost of Existing Facilities, Including All Expense Necessary To Bring the New System Into Operation, Where New Facilities Are Deemed To Be Comparable Alternatives

Telocator advocates reasonable limits on what constitutes cost compensation, defining the term to include replacement cost of existing facilities, including all expenses necessary to bring the new system into operation, where new facilities are deemed to be comparable alternatives.¹⁶ Such a proposal fully compensates 2 GHz microwave licensees for their relocations without making the costs of negotiation prohibitive and the process interminable. It responds to arguments of 2 GHz microwave licensees who fear that they will be "short-changed" and left in an inferior position, as well as those of E.T. providers who are concerned about being subjected to infinite payment obligations in terms of both time and amount.

B. An E.T. Provider's Showing That It Proposes Installing Facilities Whose Specifications Meet or Exceed Those of The Incumbent Licensee's Existing Facilities Should Give Rise To a Rebuttable Presumption of Comparability

In its opening comments, Telocator proposed that a presumption of comparability should arise where an E.T. provider demonstrates that the replacement facilities to be

¹⁶ Telocator at 11.

provided meet or exceed the incumbent's existing facilities, and supports its assessment with reliable engineering documentation.

1. The Proposed Presumption Equitably Safeguards Interests of Incumbents in Reliable Replacement Facilities While Accommodating Those of E.T. Providers Who Wish To Deploy Their New Services Promptly

The standard Telocator proposes would provide an objective, rational benchmark for judging comparability. As a result, disputes will be minimized and the negotiation process should proceed without undue delay. Moreover, use of the presumption would avoid the problem of absolute comparability in situations where microwave links have been over-engineered.¹⁷

2. Placing the Burden of Demonstrating Comparability on the E.T. Provider Is Inappropriate

Parties who would place an unreasonable burden of demonstrating comparability on the E.T. provider¹⁸ fail to recognize that the principal consequence would be to delay the transition process by embroiling the fact finder in a host of complex and subjective determinations of

¹⁷ SWB at 3-4.

¹⁸ API at 21-22; CSW at 18-19; Commonwealth Edison at 17-18; Metropolitan Water at 18-19; Montana Power at 18-19; Niagara Mohawk at 17-19; Questar at 18-19.

comparability. By setting forth an objective basis upon which an E.T. provider can establish comparability, Telocator's proposed presumption avoids such a result, ultimately promoting rapid deployment of new technologies in a manner consistent with the competing needs of the parties involved.

IV. THE COMMENTING PARTIES AGREE THAT SOME MECHANISM OF DISPUTE RESOLUTION IS ESSENTIAL IF THE TRANSITION PROCESS IS TO GO FORWARD

Commenters in this proceeding were virtually unanimous in the view that some mechanism to resolve disputes between incumbent microwave licensees and E.T. providers is essential if the transition process is to succeed.¹⁹ Telocator's proposal minimizes the imposition on limited agency resources and contains strong incentives for prompt settlement. The record reflects much support for Telocator's proposed procedures, including (1) mediation before a mutually

¹⁹ American Gas Association ("AGA") at 3-4; API at 21-22; APPA at 6-7; APCN at 5; AAR at 21; CSW at 18-19; Commonwealth Edison at 17-19; Edison Electric Institute ("EEI") at 5-6; Idaho Power at 1; LCRA at 22; Metropolitan Water at 18-19; Montana Power at 18-19; National Rural Electric Cooperative Association ("NRECA") at 7; Niagara Mohawk at 17-19; Pacific Telesis at 2; Questar at 18-19; ROLM at 5; Southern Natural Gas at 5-6; Telocator at 12-13; Time Warner at 17-18; Utilities Telecommunications Council ("UTC") at 11-15.

acceptable, neutral expert²⁰; (2) FCC intervention as a last resort only²¹; and (3) loser pays all costs of the dispute resolution process.²²

Telocator notes that proposals to place the burden of payment of dispute resolution costs on the E.T. provider are misguided.²³ First, such proposals reward dilatory tactics. Second, potential E.T. providers would be exposed to the risk of a protracted legal battle with incumbent microwave licensees. In contrast, a requirement that the losing party pay all costs associated with the dispute resolution process would penalize bad faith delays while providing incumbents with important protections against pressure to accept inferior relocation proposals.

²⁰ API at 21-22; APPA at 6-7; CSW at 18-19; Commonwealth Edison at 16-19; EEI at 5-6; Metropolitan Water at 18-19; Montana Power at 18-19; NRECA at 7; Niagara Mohawk at 17-19; Questar at 18-19; ROLM at 5; Telocator at 12-13; UTC at 11-12.

²¹ Pacific Telesis at 2; ROLM at 5; Telocator at 12-13.

²² Telocator at 12-13.

²³ See, e.g., AGA at 4.

V. THE COMMENTS RECOGNIZE THAT THE FCC MUST ADDRESS THE SPECIAL CONSIDERATIONS ASSOCIATED WITH RELOCATION OF 2 GHZ MICROWAVE LICENSEES FROM THE UNLICENSED BANDS

A. Most Commenting Parties (including both 2 GHz microwave licensees and E.T. proponents) Note That Total Band Clearing is Necessary Before Unlicensed Devices Can Be Broadly Introduced Into the Marketplace

Many commenting parties concurred with Telocator's recommendation that the Commission address the special considerations associated with deployment of unlicensed devices in designing an appropriate transition framework for those services. 2 GHz microwave licensees and E.T. providers alike observed that the nature of unlicensed devices make spectrum sharing difficult if not impossible, and that consequently, total band clearing is necessary before unlicensed devices can be broadly marketed.²⁴ As a result, many parties agree with Telocator that, in order to facilitate the introduction of unlicensed E.T. devices, relocation of 2 GHz licensees in the unlicensed band should commence without delay.²⁵

²⁴ API at 11-12; Apple at 8; APC at 8; CSW at 8-10; Commonwealth Edison at 9; Metropolitan Water at 9-11; Montana Power at 9-11; Niagara Mohawk at 9-10; North American Telecommunications Association ("NATA") at 6-8; Pacific Telesis at 2; Questar at 9-11; ROLM at 2; Omnipoint at 5; Telocator at 13-14; UTC at 22-23.

²⁵ APC at 8; Apple at 8; NATA at 6-8; Pacific Telesis at 2; ROLM at 3-4; Telocator at 13-14.

B. The Record Supports Telocator's Assertions That 2 GHz Microwave Licensees Who Cannot Technically Be Accommodated in Higher Bands, as Well as Exempt (true "public safety" Licensees Should Be Accorded a Preference in Access To Government Spectrum

Many commenting parties agree with Telocator that government spectrum in the 1710-1850 MHz band should be available, on a priority or preferential basis, to microwave users who cannot technically be relocated elsewhere.²⁶ This spectrum is a technically suitable alternative because "it provides the long range propagation characteristics necessary to accommodate POFs which cannot adequately be replaced by alternative media or higher-range microwave spectrum."²⁷

The record also reveals support for Telocator's recommendation that exempt public safety licensees receive priority access to government bands.²⁸ In view of the widespread consensus among parties that total band clearing is a prerequisite to broad-based introduction of unlicensed devices, it is logical to offer priority access as an inducement for some 2 GHz licensees not to exercise their rights to refuse relocation. Such priority access will

²⁶ API at 24; CSW at 21; Metropolitan Water at 21; Montana Power at 21; Niagara Mohawk at 21; Omnipoint at 2-3; Questar at 21; Telocator at 14; United States Telephone Association ("USTA") at 3-4.

²⁷ API at 24; CSW at 21; Commonwealth Edison at 19-20; Metropolitan Water at 21; Montana Power at 21; Niagara Mohawk at 21; Questar at 21.

²⁸ Apple at 6-7; ROLM at 3.

facilitate band clearing and speed the introduction of new services.

Lastly, Telocator reiterates its opposition to attempts to expand the definition of public safety licensees to include public power systems and other state and local government licensees.²⁹ Increasing the number of exempt licensees will only serve to further complicate the introduction of new technologies and services into the unlicensed bands.³⁰

VI. THE COMMENTS OVERWHELMINGLY FAVOR USE OF TAX CERTIFICATES AS A REGULATORY INCENTIVE TO FACILITATE NEGOTIATIONS

The record reflects widespread agreement that tax certificates should be used to encourage negotiations and settlements among incumbents and E.T. providers.³¹ Commenting parties cite a number of advantages associated with use of tax certificates, including more efficient and economical negotiations,³² reduction in costs to small

²⁹ LCRA at 10-11; Plains Electric Generation and Transmission Cooperative at 1; Public Safety Microwave Committee at 204; UTC at 3 n. 2.

³⁰ Ameritech at 6-7; Apple at 8-10; ROLM at 2-4.

³¹ AGA at 4; EEI at 6; GTE at 8; NRECA at 11-12; NYNEX at 8-9; SWB at 12; Telocator at 15; U.S. Small Business Association ("USSBA") at 7-8; U.S. West at 5-6; UTC at 27-28.

³² See, e.g., GTE at 8.

businesses engaged in developing emerging technologies,³³ and fairness to all parties concerned.³⁴ Moreover, there is a general consensus that the FCC has the requisite legal authority to issue tax certificates.³⁵

VII. CONCLUSION

For the foregoing reasons, Telocator strongly urges that the Commission adopt its recommendations in prescribing the procedures that will govern the transitioning of microwave licensees from the 2 GHz band. As explained in detail in these Reply comments, as well as in earlier phases of this proceeding, Telocator's consensus recommendations strike a sensible balance between the interests of 2 GHz microwave

³³ USSBA at 7-8.

³⁴ AGA at 4; EEI at 6; NRECA at 11-12; NYNEX at 8-9; SWB at 13; Telocator at 15; U.S. West at 5-6; UTC at 27-28.

³⁵ GTE at 8; Telocator at 15; U.S. West at 6-7; UTC at 28 n.24.

licensees and those of E.T. providers. By adopting these measures, the Commission will do much to facilitate the introduction of new Emerging Technologies services to the public.

Respectfully submitted,

TELOCATOR, THE PERSONAL
COMMUNICATIONS INDUSTRY
ASSOCIATION

By: Thomas A. Stroup NLL
Thomas A. Stroup
Mark Golden
TELOCATOR
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036
(202) 467-4770

Date: February 12, 1993